

TRAUB LIEBERMAN

Mid-Westchester Executive Park | 7 Skyline Drive | Hawthorne, NY 10532
DIRECT (914) 586-7037 | MAIN (914) 347-2600 | FAX (914) 347-8898

Gregory R. Bennett | Partner | gbennett@tlsslaw.com

February 25, 2022

Via ECF Only

Katharine H. Parker
United States Magistrate Judge
U.S. District Court 500 Pearl Street, Room 750
New York, NY 10007

Re: *Graham Chase Robinson v. Canal Prods., Inc. et al.*
Civil Action No.: 19cv9156 (LTS) (KHP)

Dear Judge Parker:

This firm represents all Defendants in the captioned action, and Tarter Krinsky & Drogin LLP represents Defendant Canal Productions, Inc. (“Canal”) as co-counsel (collectively, “Defendants”). Defendants write to respectfully request a two-week extension of time for their disclosure of rebuttal experts and service of rebuttal reports, up to March 18, 2022, and a corresponding 30-day extension of the deadline for the parties to complete expert discovery, for the reasons identified herein.

On November 8, 2021, the Court entered an Order (ECF #89) establishing the deadlines for Plaintiff to serve affirmative expert reports by February 4, 2022, rebuttal expert reports to be served by March 4, 2022, and for expert discovery to be completed by March 31, 2022.

On January 31, 2022, the Court extended Plaintiff’s deadline to disclose affirmative expert reports to February 18, 2022 (ECF #154). However, the Court did not correspondingly extend the date for Defendants’ disclosure of expert witnesses, nor their service of any rebuttal reports.

On February 18, 2022, Plaintiff served three expert reports. Defendants require a brief period of additional time to identify the specific experts they intend to disclose, to allow such expert(s) sufficient time to evaluate the three expert reports served by Plaintiff, and to prepare their own rebuttal reports. In addition, Defendants seek to extend the deadline for the parties to complete expert discovery for 30 days, up to April 30, 2022, to account for the extension granted to Plaintiff previously, and for the Court’s granting of the Defendants’ instant request, if applicable. Respectfully, Defendants submit that no party will be prejudiced by this brief extension, as the remaining fact depositions are in abeyance pending the Court’s adjudication of the Plaintiff’s Motion to Compel, such that the parties anticipate that granting the instant requests will not further delay the parties from completing

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discovery. This is Defendants' first request for an extension of the deadline to disclose experts and serve rebuttal reports. Plaintiff's counsel have not indicated whether they consent or object to the instant request as of the filing of this letter, citing the need for "time to evaluate [the] proposal, including time to reach out to [Plaintiff's] experts concerning [Defendants'] proposed schedule." In the interests of time in light of the upcoming deadline, Defendants thought it prudent to file the letter without further delay.

Defendants appreciate the Court's consideration of this request.

Respectfully submitted,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

Gregory R. Bennett

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cc: All Counsel (via ECF only)